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7 SEP 30 1999 MR. BRADSHAW: Thank you. Les Bradshaw, Nye
8 County Department of Natural Resources and Federal Facilities.

9 Appreciate all you folks coming out tonight, but
10 bear in mind that the question and answer period was not on the
11 record and those of you who made excellent statements and
12 comments during that period of time, please come back and re --
13 resubmit those oral statements for the record.

14 We've examined this Draft EIS. It's 16 or 1,700
15 pages long. There's another 30 to 40,000 pages of backup
16 materials that one could look at.

1... 17 Our preliminary assessment of this document
18 indicates that it is legally insufficient in a number of areas
19 and we urge the DOE to bring forth additional draft
20 supplemental material for the folks in Nye County and the
21 nation and the state to re-examine so that we can get a better
22 understanding of the plans.

23 You've brought forth a document that describes an
24 imprecise process. The final design for the repository hasn't
25 been set. The final mode -- route for the transportation

1 hasn't been set. The final design for the canisters hasn't
2 been set, so you want us to look at this Environmental Impact
3 Statement and understand the program that you're bringing
4 forward, and yet these decisions have not been made.

2 5 We suggest that this document is also deficient
6 in that it fails to address the cumulative impacts of all
7 federal agency actions in Nye County.

8 As you are well aware, we have in this county a
9 number of sister federal agencies to the DOE, and even the

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10 other half of DOE. We have the BLM, the Forest Service, the
11 Fish and Wildlife, we have Park Service, we have Bureau of
12 Indian Affairs.

13 We have a stack of EIS-type, NEPA-type documents
14 this high. These are all management plans for the resources of
15 Nye County.

16 We suggest that this document that you have
17 brought forth, this EIS on Yucca Mountain, fails to take into
18 account the cumulative impacts on the resources, especially the
19 water supplies, the quality of life and other aspects of life
20 in Nye County.

21 And we suggest and urge you to go back and redo
22 parts of this document that will take into effect, take into
23 account those cumulative -- cumulative accounts effects.

3 24 We also suggest to you that additional meetings
25 are necessary in Nye County. They don't have to be full-blown,

1 but they must be on the record.

2 As you have heard tonight, there are many people
3 who cannot cope with this document, that don't understand.
4 It's technically complex.

5 The issues here are issues that DOE has been
6 working on for fifteen to eighteen years, and yet you give the
7 citizens of this country and the citizens of Nye County 180
8 days to take this document into account, fully integrated into
9 the cognizance of the community as a whole.

10 It's insufficient time. You must come back to
11 Nye County and hold additional meetings in this town, Amargosa,
12 Beatty, Tonopah and Round Mountain to give the residents of

13 this county sufficient time to digest and understand this
14 document.

15 We also suggest that additional information be
16 made about the details of the transportation program that
17 you're suggesting.

18 There have been questions asked here tonight that
19 you've not been able to answer or have not answered. Perhaps
20 because of the experts that you have on hand weren't versed in
21 that particular area, but also because maybe the answers have
22 not been precisely delineated.

23 We urge you to come back with a more precise plan
24 so that the folks in this community can understand this program
25 and ask you reasonable questions about it and get reasonable
1 answers.

4 2 As you look at the maps back here and as this
3 audience looks at those maps on the wall, you've -- you've told
4 us that virtually any public state highway coming into Nye
5 County could be a potential route for a truck borne
6 transportation of high-level waste, that there's a number of
7 routes that are proposed for rail routes.

8 So we have to be prepared and integrate into our
9 planning for the next eight to ten years all possibilities for
10 all those routes and all those modes.

11 You haven't given us precise information on
12 quantities, scheduling, and certainly as you heard here
13 tonight, the public understanding of the risks associated with
14 this document are poorly understand -- understood.

5 15 We suggest to you that your -- that the models

16 that you've used to calculate safety or to put another way, the
17 models that you've used to calculate risk, radiologic
18 exposure, transportation risks and risks to the groundwater in
19 many instances have been based on insufficient data, and -- and
20 those models in some cases have been criticized by national
21 peer review groups as being insufficient and based on
22 inadequate data.

23 We urge you to reconsider those parts of the
24 document, wait until there's enough information available
25 before you -- before decisions are made as to whether Yucca

1 Mountain should go forward.

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2 You owe it to the citizens of this county to get
3 clear, precise answers. There is no other county in the nation
4 to whom you owe a greater debt of clarity, preciseness and a
5 sufficient database upon which to base answers, and we urge you
6 to come forward with additional information.

7 Nye County will be submitting detailed comments
8 on this document and we like the other federal agencies, NRC
9 and ACNW and TRB, State of Nevada and others will be carefully
10 examining this document and giving you precise technical
11 comments on the inefficiency and suggesting ways that the
12 document could be improved.

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13 We do understand that this hearing is about the
14 legal sufficiency or the adequacy of the EIS as a decision-
15 making document, and our message to you tonight is that this
16 document is not adequate as a decision-making tool, that it
17 needs to be reworked there -- and be made more clear and to
18 give this community, the citizens of Nye County and especially

19 Beatty/Amargosa/Pahrump area, that community which will be most
20 directly impacted by the -- the impacts of this project, give
21 these folks enough time to understand the project, bring forth
22 your plans when you have plans and let this community have a
23 reasonable time to have a public discussion about the impacts
24 in their own community.

25 Thank you.